

Lisa A. Rasmussen, Esq.
Nevada Bar No. 7491
**THE LAW OFFICES OF KRISTINA
WILDEVELD & ASSOCIATES**
550 E. Charleston Blvd., Suite A
Las Vegas, NV 89104
(702) 222-0007 (T) | (702)222-0001
Email: Lisa@VeldLaw.com

Attorneys for Defendant Karen Chapon

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KAREN CHAPON,

Defendant.

Case No.: 2:20-cr-286 JCM

**STIPULATION TO CONTINUE
SENTENCING HEARING
(SECOND)**

The parties, Karen Chapon, by and her counsel, Lisa A. Rasmussen, Esq., and the United States, by and through its counsel, Assistant United States Attorney Jessica Oliva, hereby stipulate as follows:

1. Sentencing was originally set for November 29, 2023 in this matter.
2. Ms. Rasmussen was appointed to represent Ms. Chapon on October 10, 2023. ECF 124. At that time the parties entered into a stipulation to continue the sentencing to permit Ms. Rasmussen time to get up to speed with Ms. Chapon and to properly prepare for sentencing. See Stipulation (First) at ECF 125. This resulted in the sentencing being reset to January 12, 2024, it's presently scheduled date. ECF 126.

1 3. On November 6, 2023, the undersigned filed a motion to withdraw in
2 consultation with Ms. Chapon. ECF 127.

3 4. On November 17, 2023, this Court denied the Motion. ECF 129.

4 5. Ms. Rasmussen was out of the country from November 27, 2023 until
5 December 2, 2023 and she discussed the denial with Ms. Chapon in early December when
6 she returned.

7 6. After consultation with Ms. Chapon, Ms. Rasmussen filed a notice that she
8 would proceed as counsel for Ms. Chapon essentially notifying the court that she would
9 not refile another motion that addressed some of the infirmities the court pointed out
10 from the initial motion. ECF 131.

11 7. It was not until this point that Ms. Rasmussen began working with Ms.
12 Chapon on sentencing issues and other issues that needed to be addressed.

13 8. On December 23, 2023 Ms. Rasmussen's family suffered the tragic loss of
14 her 13-year-old nephew during an accident while her family was gathered for the
15 Christmas holiday. As a result, Ms. Rasmussen's efforts have been devoted to addressing
16 her family's crisis and loss. The combination of losing time with Ms. Chapon in
17 November and early December and not have sufficient time between the Christmas
18 holiday and today to work on Ms. Chapon's sentencing issues requires her to ask for an
19 extension of time to properly prepare for Ms. Chapon's sentencing hearing.
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21 9. Ms. Rasmussen is requesting a date in late February.

22 10. The government is not opposed to this request.

23 11. Ms. Chapon is on pretrial release and is not opposed to this request.

24 12. Denial of this request would cause prejudice to both the government and
25 the defendant.

26 Dated this 4th day of January, 2024.

27
28 **The Law Offices of Kristina Wildeveld & Associates,**
STIPULATION TO CONTINUE SENTENCING HEARING(SECOND) - 2

1
2 /s/ Lisa A. Rasmussen

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4 LISA A. RASMUSSEN, ESQ.
5 Counsel for Karen Chapon
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7 **JASON FRIERSON,**
8 **United States Attorney**
9 **District of Nevada**

10 /s/ Jessica Oliva

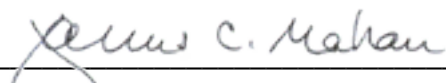
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12 BY: JESSICA OLIVA
13 Assistant United States Attorney

14 **ORDER**

15 Pursuant to the Stipulation of the parties, and good cause appearing,

16 IT IS FURTHER ORDERED that the Sentencing hearing presently
17 scheduled for January 12, 2024 shall be vacated and reset to **February 26, 2024, at**
18 **10:00 a.m.**

19 DATED January 5, 2024.

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21 _____
22 The Honorable James C. Mahan
23 United States District Judge
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